



FARM

Farm Animal Reform Movement

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May 18, 1999

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Comments Regarding Proposed Revisions to Labeling Requirements For Foods Treated With Ionizing Radiation [Docket No. 98N-1038].

To Whom It May Concern:

We write to ask that every product that has been irradiated, or contains an irradiated ingredient, contain a conspicuous disclosure statement along with the radura logo. We also ask that these labeling requirements do not expire at some future date.

Farm Animal Reform Movement is a national, nonprofit public interest organization that specializes in consumer education about food safety issues. Treating food with irradiation to decrease the risk of food-borne illness does not address the fundamental underlying issue of why the incidences of bacterial infection are increasing. The new Hazard Analysis Critical Control Points (HACCP) inspection process has taken qualified inspectors off of assembly lines and left the industry to regulate itself. Thirty-five million Americans get sick from tainted food every year, resulting in an estimated 9,000 deaths. Giving industry sole control over food safety and treating food with irradiation to try to eliminate resulting contamination are not acceptable solutions to the food-borne illness problem.

If irradiation of food is to become widespread, consumers deserve to be informed in a clear, truthful manner about the process, for the duration of its use. Until the public is familiar with both the irradiation process and the term "irradiation", warnings should be conspicuously placed and more prominent than the list of ingredients. Consumers have the right to know how their food was produced regardless of whether certain labels might cause unfounded alarm. Failing to disclose processing methods that materially change the characteristics of food is inaccurate, misleading and irresponsible.

We are grateful for the opportunity to comment on this proposed rulemaking.

Sincerely,

Lucy Wheeler Goodrum
Research Director

Recycled Paper

98N-1038

"Saving Our Planet - One Bite at a Time"

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